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July 22, 2010

**VIA ECF (COPY BY FEDERAL EXPRESS)**

Hon. Claire C. Cecchi, U.S.M.J.  
United States District Court  
M.L. King, Jr. Federal Building and  
United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: *Panasonic Corporation v. Freescale Semiconductor, Inc.*,  
Civil Action No.: 10-cv-1668 (JLL) (CCC)

Dear Judge Cecchi:

Pursuant to the July 16, 2010 R.16 conference before Your Honor, attached please find a proposed form of Pretrial Scheduling Order as consented to by all parties. The parties respectfully request that Your Honor execute the enclosed and direct its entry on the docket.

We thank the Court for its attention and courtesies.

Respectfully,

s/ Sheila F. McShane

Enclosure

cc: Gregory J. Bevelock, Esq. (via email)  
James L. Wamsley, III, Esq. (via email)  
Marc S. Blackman, Esq. (via email)  
Jack Q. Lever (via email)  
Kevin X. McGann (via email)  
Bijal V. Vakil (via email)  
David M. Tennant (via email)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

PANASONIC CORPORATION

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

Civil Action No. 2:10-cv-1668 (JLL)(CCC)

**PRETRIAL SCHEDULING ORDER**

**THIS MATTER** having come before the Court for a scheduling conference pursuant to Rule 16 of the Federal Rules of Civil Procedure on July 16, 2010; and for good cause shown:

**IT IS on this \_\_\_\_th day of July, 2010**

**ORDERED THAT:**

**I. DISCLOSURES**

1. Fed. R. Civ. P. 26 disclosures are to be exchanged on or before **July 28, 2010**.
2. By **August 11, 2010**, Plaintiff shall produce to Defendant its Disclosure of Asserted Claims and Infringement Contentions and document production as required under L. Pat. R. 3.1 and 3.2.
3. By **October 8, 2010**, Defendant shall provide to Plaintiff its Invalidity Contentions and document production as required under L. Pat. R. 3.3 and 3.4.

**II. CLAIM CONSTRUCTION**

4. By **October 22, 2010**, the parties shall exchange a list of claim terms that each contends should be construed by the Court, and the parties shall thereafter meet and confer for the purpose of limiting the terms in dispute pursuant to L. Pat. R. 4.1.

**III. DISCOVERY**

5. The parties may serve interrogatories limited to **twenty-five (25)** single questions to be responded to within **thirty (30) days of receipt**.

#### IV. DISCOVERY CONFIDENTIALITY ORDERS

6. By August 16, 2010: (a) the parties shall present a consent discovery confidentiality order, supported by a sufficient certification under L. Civ. R. 5.3(b)(2); or (b) in the absence of consent, a party shall, supported by a sufficient certification, apply for entry of a discovery confidentiality order under L. Civ. R. 5.3(b)(5) and L. Civ. R. 37.1(a)(1). The Court will decide those issues and enter the appropriate order, or the Court may enter the District's approved Discovery Confidentiality Order as set forth in Appendix S to the Local Patent Rules if appropriate, in whole or in part. With respect to all issues of discovery confidentiality, the parties shall comply with all terms of L. Civ. R. 5.3.

#### V. FUTURE CONFERENCES

7. There shall be a telephone status conference before the Undersigned on **November 3, 2010 at 2:00 p.m.** Plaintiff shall initiate the telephone call.

HON. CLAIRE. C. CECCHI  
United States Magistrate Judge

Original: Clerk of the Court  
cc: Hon. Jose L. Linares, U.S.D.J.  
All Parties  
File